From: Larry Hoff [lhoff@fibrecu.com]
Sent: Monday, February 02, 2009 5:05 PM

To: _Regulatory Comments

Subject: Comments on Advanced Notice of Propsed Rulemaking for Part 704

Larry Hoff 11609 NW 24th Ave Vancouver, WA 98685-3691

February 2, 2009

Mary Rupp Secretary to the Board National Credit Union Administration 1775 Duke Street Alexandria, VA 22314

Dear Ms. Rupp:

Dear Ms. Rupp,

Have all other sources of funds been exhausted prior to the actual credit union assessment being currently discussed? Have TARP funds been excluded as an option? If so, why?

If credit unions are subjected to the assessment, taking the hit directly to reserves would seem to be the logical treatment. Passing it through the income statement would unnecessarily trigger additional oversight on performance ratios during the assessment period and skew trend lines for years to come. In addition, an argument could be made that this issue was actually created well before 2009.

Sincerely,

Larry Hoff 360-414-4201